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U.S. Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

July 13, 2020

By ECF

Honorable Paul A. Crotty United States District Judge Southern District of New York Daniel Patrick Moynihan U.S. Courthouse 500 Pearl Street New York, NY 10007

Re: United States v. Tagliaferro, et al., 19 Cr. 472 (PAC)

Dear Judge Crotty:

The parties jointly request that the Court adjourn the status conference currently scheduled for July 17, 2020, given the continued uncertainty as to when a trial in this matter can be scheduled. Counsel for defendant Tagliaferro seeks an adjournment of approximately 60 days. The Government seeks an adjournment of approximately 30 days, in the hope that there will be further information within 30 days. Counsel for defendant DeFalco consents to the adjournment, and has no preference as to the date.

If the Court grants the adjournment request, the Government respectfully requests that the Court exclude time between now and the next conference date, pursuant to 18 U.S.C. § 3161(h)(7)(A), in light of recent public events and their effect on the parties' ability to prepare for trial. Both defendants consent to the request to exclude time through either date.

7/14/2020

The July 17 conference is adjourned to Monday, August 17 at 11:15 AM. Time is excluded through August 17, 2020, to allow the parties to prepare for trial. SO ORDERED.

Respectfully submitted,

AUDREY STRAUSS
Acting United States Attorney
Southern District of New York

/s/

By:

Thomas A. McKay / Jarrod L. Schaeffer Assistant United States Attorneys Tel: (212) 637-2268 / 2270

cc: Counsel of Record (via ECF)

Raul A Coth